

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

MICHAEL DEBLASIO,
DERRICK SCOTT,
JULIUS LOPEZ,
AND
DESHAUN ALLEN
DEFENDANTS

CRIMINAL NO.: H-

19CR 457

**United States Courts
Southern District of Texas**

JUN 18 2019

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Top Golf, is a company with headquarters in Dallas, Texas and locations throughout the United States, United Kingdom and Australia, engaged in the business of sports entertainment and sale of consumer goods which are shipped in interstate and foreign commerce and which affect interstate and foreign commerce.

COUNT ONE

Title 18, United States Code, §§ 1203(a) and 2 –Aiding and Abetting Hostage Taking

On or about August 26, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
DESHAUN ALLEN,
AND
DERRICK SCOTT

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did seize, detain, threaten to kill and injure, and continue to detain, Elhadji Dione, a foreign national, in order to compel a third person to pay ransom, reward or do any act as an explicit or implicit condition for the release of Elhadji Dione.

In violation of Title 18, United States Code, §§ 1203 (a) and 2.

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about August 26, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
DESHAUN ALLEN,
AND
DERRICK SCOTT

Defendants herein, aiding and abetting each other and others known to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Hostage Taking, as alleged in Count One.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT THREE

Title 18, United States Code, §§ 1201(a) and 2 –Aiding and Abetting Kidnapping

On or about August 26, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
DESHAUN ALLEN,
AND
DERRICK SCOTT

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully seize, confine, kidnap, abduct and carry away and hold for some ransom, reward, and otherwise, to wit: to obtain United States Currency from a third party, Elhadji Dione, and, in committing or in furtherance of the commission of the offense used cellular telephones and vehicles, a means, facility, and instrumentality of interstate or foreign commerce.

In violation of Title 18, United States Code, §§ 1201 (a) and 2.

COUNT FOUR

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about August 26, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
DESHAUN ALLEN,
AND
DERRICK SCOTT

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Kidnapping, as alleged in Count Three.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT FIVE

Title 18, United States Code, §§ 1201(a) and 2 –Aiding and Abetting Kidnapping

On or about August 28, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully seize, confine, kidnap, abduct and carry away and hold for some ransom, reward, and otherwise, to wit: to obtain United States Currency from a third party, Ferdinand Thompson, and, in committing or in furtherance of the commission of the offense used cellular telephones and vehicles, a means, facility, and instrumentality of interstate or foreign commerce.

In violation of Title 18, United States Code, §§ 1201 (a) and 2.

COUNT SIX

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about August 28, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Kidnapping, as alleged in Count Five.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 1951(a) and 2 –Aiding and Abetting Interference with Commerce by Robbery

On or about August 28, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Top Golf, located at 1030 Memorial Brook, Houston Texas, which was in the possession and custody of an employee of Top Golf, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT EIGHT

**Title 18, United States Code, §§ 924(c)(1)(A) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence**

On or about August 28, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Seven.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT NINE

Title 18, United States Code, §§ 1201(a) and 2 –Aiding and Abetting Kidnapping

On or about August 29, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
AND
JULIUS LOPEZ

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully seize, confine, kidnap, abduct and carry away and hold for some ransom, reward, and otherwise, to wit: to obtain United States Currency from a third party, Homero Cardenas, and, in committing or in furtherance of the commission of the offense used cellular telephones and vehicles, a means, facility, and instrumentality of interstate or foreign commerce.

In violation of Title 18, United States Code, §§ 1201 (a) and 2.

COUNT TEN

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about August 29, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
AND
JULIUS LOPEZ

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Kidnapping, as alleged in Count Nine.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT ELEVEN

Title 18, United States Code, §§ 1201(a) and 2 –Aiding and Abetting Kidnapping

On or about August 30, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
JULIUS LOPEZ,
AND
DERRICK SCOTT

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully seize, confine, kidnap, abduct and carry away and hold for some ransom, reward, and otherwise, to wit: to obtain United States Currency from a third party, Ronald Enamorado, and, in committing or in furtherance of the commission of the offense used cellular telephones and vehicles, a means, facility, and instrumentality of interstate or foreign commerce.

In violation of Title 18, United States Code, §§ 1201 (a) and 2.

COUNT TWELVE

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2: -
Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about August 30, 2018, in the Houston Division of the Southern District of Texas,

MICHAEL DEBLASIO,
JULIUS LOPEZ
AND
DERRICK SCOTT

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Kidnapping, as alleged in Count Eleven.

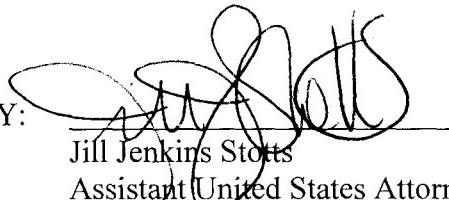
In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

A TRUE BILL:

FOREMAN OF THE GRAND JURY

Ryan K. Patrick
United States Attorney

BY:


Jill Jenkins Stotts
Assistant United States Attorney